

**J. Singer Law Group, PLLC**

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**UNITED STATES BANKRUPTCY COURT  
SOUTH DISTRICT OF NEW YORK**

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**In Re:**

**Chapter 11**

**Case No. 22-10943-mew**

**VOYAGER DIGITAL HOLDINGS, INC. et. al.<sup>1</sup>**

**Debtors**

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**MOTION TO RESUBMIT EXHIBIT WITH PERSONALLY IDENTIFIABLE  
REDACTED**

TO THE HONORABLE MICHAEL E. WILES,  
UNITED STATES BANKRUPTCY JUDGE

Matthew Levitt (“Levitt”) hereby moves, through its undersigned counsel J. Singer Law Group, PLLC, pursuant to Code Section 105(a) and the Court’s general equitable powers to resubmit that certain document known as Exhibit A to the Affidavit of Matthew Levitt, dated July 28, 2022 (“Levitt Aff.”) (ECF #161) with personally identifiable information redacted.

On July 28, 2022, Levitt submitted Ex. A to the Levitt Aff. in conjunction with its limited objection to the Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to (A) Honor Withdrawals for the MC FBO Accounts, (B) Liquidate Cryptocurrency From Customer Accounts with a Negative Balance, (C) Sweep Cash Held in Third-Party Exchanges, (D) Conduct Ordinary

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<sup>1</sup>

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (N/A); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

Course Reconciliation of Customer Accounts, and (E) Continue Staking Cryptocurrency, and (II) Granting Related Relief and Cross Moves, pursuant to Sections 105(a) and 1122 of Title 11 of the United States Bankruptcy Code, 17 CFR Part 240, Rules 5070-1 of the Local Rules for the Southern District of New York Bankruptcy Court for (A) a determination that Levitt is a cash customer whose withdrawal request must be honored, and (B) granting such other and further relief as the Court deems just and proper (“Limited Objection”).

In its original filing, Counsel inadvertently included certain personally identifiable information including bank account routing information, private email addresses, phone numbers and other information. Staff at the Court recognized that this information was included and redacted that exhibit and alerted the undersigned counsel on the same and the need to file a motion to seal or similar motion. In order to cure this matter, counsel hereby makes this motion to file the revised and redacted Exhibit A attached hereto. There is no prejudice to any party in permitting such filing and request is hereby made that the Court grant this request.

### **MOTION PRACTICE**

This Motion includes citations to the applicable rules and statutory authorities upon which the relief requested herein is predicated and a discussion of their application to this Motion. Accordingly, Levitt submits that this Motion satisfies Local Rule 9013-1(a).

### **NO PRIOR REQUEST**

No prior request for the relief sought in this Motion has been made to this or any other court.

## CONCLUSION

WHEREFORE for the reasons stated herein and in the accompanying Levitt Aff. and exhibits attached thereto, this Court should (i) permit the re-filing of Exhibit A, (ii) deeming the re-filed document to have been filed timely, and (ii) granting such other and further relief as the Court deems just and proper.

Date: New York, NY  
July 29, 2022

**J. Singer Law Group, PLLC**  
*Counsel for Matthew Levitt*

By: /s/ Jeb Singer  
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